

In support of this Motion, Petitioner states that his Motion To Apply *De Novo* Review presents complex issues on a variety of causes of action in this capital case, and that leave to file a reply memorandum will permit Petitioner to address the arguments raised by the State in its opposition to Petitioner's motion. Petitioner also states that, due to counsel's busy schedule, a modest extension of time is necessary to allow Petitioner to fully and adequately brief his reply. This extension will not affect any postponement of any other deadlines in the case schedule.

Respectfully submitted,

/s/ Robert L. Hutton

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on June 12, 2015, a true and correct copy of the foregoing document was served through the Court's ECF System on Jennifer L. Smith and Michael Matthew Stahl, Office of the Attorney General, State of Tennessee, 425 Fifth Avenue North, Nashville, TN, 37202.

/s/ Robert L. Hutton

Robert L. Hutton